

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

KANAUTICA ZAYRE-BROWN,

*Plaintiff,*

v.

No. 3:22-cv-00191

THE NORTH CAROLINA  
DEPARTMENT OF PUBLIC SAFETY,  
*et al.,*

*Defendants.*

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Kanautica Zayre-Brown respectfully moves the Court, pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, for a preliminary injunction on her Eighth Amendment claim against defendant state prison officials Buffaloe, Ishee, Junker, Harris, Campbell, Catlett, Peiper, Sheitman, Langley, Agarwal, Cobb, Panter, Williams, and Amos, sued in their official capacities (hereinafter, “Defendants”) for their failure to treat her gender dysphoria, a serious medical need. Specifically, Plaintiff asks the Court to order Defendants to provide her with the medically necessary gender-affirming surgery described in her Verified Complaint. (Doc. 1). As demonstrated in the accompanying brief and exhibits supporting this Motion, Plaintiff will likely succeed on the merits of her Eighth Amendment claim, she is suffering and will continue to suffer irreparable harm without preliminary relief, the balance of equities weighs in her favor, and preliminary relief is in the

public interest. Plaintiff also moves for waiver of a security bond upon grant of the preliminary injunction.

Plaintiff seeks leave to present oral argument in support of this Motion.

Dated: June 28, 2022

Respectfully submitted,

/s/ Jaclyn A. Maffetore

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*Counsel for Plaintiff*

### **CERTIFICATE OF CONFERENCE**

Pursuant to LR 7.1(b), I certify that on June 22, 2022, counsel for Plaintiff conferred with counsel for Defendants via email to notify them of Plaintiffs' intent to file the instant Motion and to inquire whether the relief sought would be possible without judicial intervention. On June 23, 2022, counsel for Defendants indicated that, following discussion with their clients, they did not believe that settlement discussions would be productive at this time.

Dated: June 28, 2022

Respectfully submitted,

/s/ Jaclyn A. Maffetore  
Jaclyn A. Maffetore

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on June 28, 2022, I filed the foregoing with the Clerk of the Court using the CM/ECF system which will effect service on all counsel of record.

Dated: June 28, 2022

Respectfully submitted,

/s/ Jaclyn A. Maffetore

Jaclyn A. Maffetore

*Counsel for Plaintiff*